



**SOUTHERN STATES
POLICE BENEVOLENT ASSOCIATION, INC.**

1517 Southlake Parkway
Morrow, Georgia 30280-3080

Post Office Box 816
Atlanta, Georgia 30354-0878

(404) 960-0092 • 1-800-233-3508

FAX: (404) 968-0658

FEDERAL ELECTION
COMMISSION
FEB 24 11 04 AM '94

February 18, 1994

Ms. Debbie Manzano
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: Mid-Year Report 1/93-6/93
Identification No. C00265546

Dear Ms. Manzano:

This will respond to and address the questions raised by your letter of February 9, 1994:

The three transfers of funds from our Alabama, Tennessee and Georgia P.A.C. accounts, and combined into our one remaining committee (Southern States P.B.A. PAC) are clearly permitted under 11 C.F.R. Section 102.6(a).

Further, none of the items noted are "contributions" as that term is defined in 11 C.F.R. Section 114.1(a)(2)(iii).

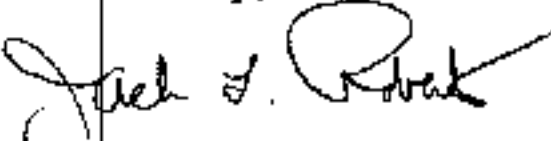
Our committee does indeed finance both federal and nonfederal activity as reflected in our previous reports. Whereas, the former state committees (not registered with the Commission) financed only state and local political activity, all funds therein as well as all funds in our committee are from a common source: voluntary donations from the members of our affiliated organization, Southern States P.B.A., each of whom understand that the funds are used in both federal and non-federal activity.

Thus, the Schedule "A" items totally \$3,907.18 represent nothing more than a combining of three bank accounts into one in order to simplify bookkeeping.

We trust that the foregoing explanation adequately resolves the questioned transfers but if not, or if they should have been reported in a different manner, please inform us. It remains our intent to scrupulously comply

with all regulations and requirements of the Commission.

Sincerely,


Jack L. Roberts,
Treasurer

JLR/caa

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